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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

VS.

RENE ALEJANDRO POMPA-VILLA, a/k/a "Patna," a/k/a "Christian Alexander Marrero-Ocasio," a/k/a "Felix Berrios," a/k/a "Mario Rodriguez-Albelo," a/k/a "Jorge Arzuaga-Ortiz," and a/k/a "Victor Rivera-Diaz," CHRISTOPHER POMPA-VILLA, VICTOR AUGUSTIN POMPA-VILLA, CARLOS ARMANDO CAMACHO, HEYDIMAR CARRION MARRERO, KIMBERLY RENEE MACKEY, DUSTIN ROBERT NOONAN, TYLER JON LANDROCHE, KYLE JAY REDPATH, AND JESSICA TWIGG,

Defendants.

No. 3:21-cr-00031-JMK-DMS

EX PARTE MOTION TO SEAL INDICTMENT AND DELAY ARRAIGNMENT AND ENTRY OF CASE INTO THE ELECTRONIC FILING **SYSTEM** FILED UNDER SEAL

The United States asks the court to seal the indictment in this case and to delay its entry into the electronic filing system in accordance pursuant to Fed. R. Crim. P. 6(e)(4) until April 9, 2021.

The indictment includes ten defendants located in three different districts. The following defendants are likely in Arizona: Rene Alejandro Pompa-Villa, Christopher Pompa-Villa, Victor Augustin Pompa-Villa, and Heydimar Carrion Marrero. Carlos Armando Camacho is likely present in the Southern District of California. Kimberly Mackey, Kyle Redpath, and Jessica Twigg are in Alaska. Dustin Robert Noonan is in federal custody on an unrelated prosecution in 3:20-CR-00053-TMB-MMS. Tyler Jon Landroche is serving a sentence in the Alaska Department of Correction for unrelated state charges with an expected release date of November 19, 2022.

Unsealing the indictment on April 9, 2021, will allow a coordinated effort to locate and arrest the ten defendants in three different districts. If the indictment is unsealed prematurely, there is a serious risk of flight and possible destruction of evidence. One of the overt acts describes how Rene Pompa-Villa committed passport fraud to allow his passage to and from the United States and Mexico to further his drug trafficking organization. Furthermore, Kyle Redpath was indicted for destroying evidence in this federal investigation. Thus, if the existence of the investigation is revealed through public disclosure of any of the indictment, a significant risk exists that this information will

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quickly be disseminated, which in turn, will allow the remaining defendants to flee evading

prosecution, and possibly destroying additional evidence.

Accordingly, the United States asks the court to find that the public interest in access

to the indictment is outweighed by law enforcement interests, and to seal the indictment

along with and any associated arrest warrants, as well as to delay the arraignments of

defendants and the entry of the indictment into the electronic filing system, until April 9,

2021, at 5:00 p.m. If all defendants are arrested prior to that date, the government will

promptly notify the court and file an appropriate motion to unseal.

RESPECTFULLY SUBMITTED March 17, 2021 at Anchorage, Alaska.

E. BRYAN WILSON

Acting United States Attorney

s/ Karen Vandergaw

KAREN VANDERGAW

Assistant United States Attorney

United States of America

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